



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

March 2, 2017

Adam Rogge
Director of Regulatory Compliance
Badger Creek Limited
34759 Lencioni Avenue
Bakersfield, CA 93308

SUBJECT: Request for Additional Information Pertaining to Technical Review of the Class I
Non-Hazardous Underground Injection Control (UIC) Permit Application
Badger Creek Limited, Bakersfield, California. **UIC Permit No. R9UIC-CA1-FY17-1**

Dear Mr. Rogge:

US EPA Region 9 (EPA) has commenced technical review of your Permit Application dated September 29, 2016 and your submittal of additional information requested in our letter dated October 28, 2016 (additional submittal dated December 15, 2016). As a result of our preliminary technical review, we have determined that some critical information concerning the zone of endangering influence (ZEI) and Area of Review (AoR) calculations has not been provided. The pressure buildup calculations are not shown or described in sufficient detail, the current static reservoir pressure in the injection zones is not shown and the basis for the pressure gradient used (0.405 psi/ft.) is not given. The calculations provided in your application cannot be validated without your identification of the equation(s) used in the ZEI/AoR calculations along with supporting information.

Please submit the calculations used for evaluating the ZEI and AoR for this project, showing all work and formulas. Our technical review of the permit package cannot be completed without this information.

If you have any questions regarding this letter, please contact Joel Coffman (415) 972-3530.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Albright", is positioned above the printed name.

David Albright
Manager, Drinking Water Protection Section

cc: Bill Bartling, DOGGR Inland District
Shelton Gray, RWQCB, Central Valley Region, Fresno Office